

# EXHIBIT Q

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

<p>CAROL S. MARCELLIN, individually, and as Co-Administrator of the Estate of Charles E. Hollowell, deceased, and JESSICA HOLLOWELL-McKAY, as Co-Administrator of the Estate of Charles E. Hollowell, deceased,</p> <p>Plaintiffs,</p> <p>v.</p> <p>HP INC., and STAPLES, INC.,</p> <p>Defendants.</p>	<p>Civ. No. 1:21-cv-00704-JLS</p>
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**DEFENDANT HP INC.'S ANSWERS TO PLAINTIFFS'  
THIRD SET OF INTERROGATORIES**

HP Inc. hereby makes these answers to plaintiffs' third set of interrogatories:

**INTERROGATORIES**

1. Describe in detail the designed function of Pin No. 6 on the approved battery pack described in Deposition Exhibit 4, at page HP01311, and specifically, what the motherboard is programmed to do if the thermistor in the battery pack connected through Pin No. 6 registers a temperature over 45 ° C.

ANSWER: HP Inc. objects to this interrogatory as overly broad, unduly burdensome, disproportional to the needs of the case and vague and ambiguous as framed. Notwithstanding, subject to, and without waiving the foregoing, a thermistor attached to the battery cells senses temperature. This thermistor is connected through the battery connector Pin 6 to the Embedded controller on the motherboard. At some temperature over 45° C, the embedded controller will inhibit charging to the battery.

2. Describe in detail the means in which the integrated embedded controller on the motherboard that receives and relays temperature information from the thermistor in the battery pack through Pin No. 6 , receives, acts on, and relays temperature information to the motherboard.

ANSWER: HP Inc. objects to this interrogatory as overly broad, unduly burdensome, disproportionate to the needs of the case and vague and ambiguous as framed. Notwithstanding, subject to, and without waiving the foregoing, the embedded controller periodically reads a voltage on the battery connector Pin 6 and compares against a threshold. When this threshold is exceeded, the embedded controller programs a setting inside the battery charger integrated circuit on the motherboard that disables current flow to the battery cells.

The undersigned deposes and states under penalties of perjury, on Tuesday, January 23, 2024, that I am the Manager, Global Claims & Insurance with HP Inc., defendant in the above-captioned action I have read the foregoing answers to interrogatories and know the contents thereof; these answers were prepared with the assistance of counsel upon whose advice I have relied; that the answers set forth herein, subject to inadvertent or undiscoverable errors, are not all within my personal knowledge and there is no employee of HP Inc. who has knowledge of all such matters; that the answers herein are based on and are, therefore, necessarily limited by records in and information still in existence, presently recollected and thus far discovered in the course of preparation of these answers; that HP reserves the right to supplement or make any changes in the answers if it appears at any time that omissions or errors have been made or that more accurate information is available; that subject to the limitations set forth herein these answers are true to the best of my knowledge, information and belief.

HP Inc.,

BY: 

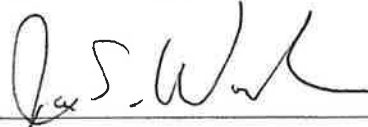
Monica Olis

Its: Manager – Global Claims & Insurance

As to objections:

HP INC.,

By its attorneys,



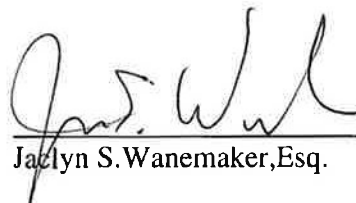
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Certificate of Service

I, Jacklyn S. Wanemaker, do hereby certify that on January 25, 2024, I served a copy of the within document via email.

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